Special Session / Hearing to Review S-20 Proposais

November 8th, 2017

The agenda items covering appeal of minor modification and wall height waiver decision have been addressed by Holly Fletcher (et.al.) in written and oral responses.

Conditional Use Permit issues:

The last Environmental Impact Statement (EIS) review appears to have been in 2011 according to the city website. In all of the discussions prior to this meeting we have been told that everything currently planned by DevCo is "acceptable" under that EIS study. There has been a lot of growth in the area and any decisions made back in 2006 (original EIS) need to be revisited.

1) The King County IMAP system lists several concerns about the S-20 site. When the last EIS study was done it did not consider the scale of the DevCo proposal. The number of buildings, the height of the buildings, and the amount of allocated parking areas will disrupt run off during typical rain fall. A new EIS should be required prior to approval of any project on S-20 using the footprint of that proposal as a model to truly evaluate environmental impact.

Seismic studies need to be performed to validate that on the S-20 site the proposed large retaining walls will not increase any land slide potential. Several existing properties and the proposed new structures would be at risk from any slide activity if the retaining walls do not exceed expectations.

- 2) According to attachment B, Use Table, of the MUFP (attached) S-20 is allocated for single-family or six-units maximum multiplex with a maximum of 150 units. The DevCo request for 191 units on this small property is way out of line with any other project of its kind in King County. Even 150 units exceeds the number of units required to fulfill the city's affordable housing goals and needs. I think the number used in the past is 122 units to meet the goal using the 60% of median guideline. The DevCo proposal is just way too large.
- 3) The effect of putting in any multi-family project on S-20 without more than one point of entry/egress is a potential disaster waiting to happen. Several hundred more travel uses would occur each day. The traffic flow on Jacobia St. is already dangerous due to the under-design of the turn from Frontier. The city has ceded the rights to the hospital that block another point of access to S-20 from the south but DevCo must be required to come up with another solution if they want to develop that site.

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ATTACHMENT B USE TABLE

Modified November 17, 2008, June 8, 2009 and June 6, 2011

Parcel No.	Residential Density	Gross Dev. Acres	Unit Range ¹¹¹	Permitted Uses	Conditional Uses
N-1	4-9 DU/acre	19.4 acres	54-122 units	SF detached, SF attached, up to Six-unit multiplex, Day Care I, Accessory Dwelling Unit, Home Occupations, Parks and Open Space, Public Utilities	Bed and Breakfast, church
N-2	4-9 DU/acre	14.2 acres	406-89 units	SF detached, SF attached, up to Six-unit multiplex, Day Care I, Accessory Dwelling Unit, Home Occupations, Parks and Open Space, Public Utilities	Bed and Breakfast, church
N-3	4-9 DU/acre	4.6 acres	13-29 units	SF detached, SF attached, up to Six-unit multiplex, Day Care I, Accessory Dwelling Unit, Home Occupations, Parks and Open Space, Public Utilities	Bed and Breakfast, church
N-4	4-9 DU/acre	24.0 acres	67-151 units	SF detached, SF attached, up to Six-unit multiplex, Day Care I, Accessory Dwelling Unit, Home Occupations, Parks and Open Space, Public Utilities	Bed and Breakfast, church
N-5	3-5 DU/acre	7.7 acres	16-27 units	SF detached, SF attached, up to Six-unit multiplex, Day Care I, Accessory Dwelling Unit, Home Occupations, Parks and Open Space, Public Utilities	Bed and Breakfast, church
N-6	3-5 DU/acre	11 acres	23-38 units	SF detached, SF attached, up to Six-unit multiplex, Day Care I, Accessory Dwelling Unit, Home Occupations, Parks and Open Space, Public Utilities	Bed and Breakfast, church
High School Site (N-7)	5-8 DU/acre	35 acres	122-196 units	SF detached, SF attached, up to Six-unit multiplex, Day Care I, Accessory Dwelling Unit, Home Occupations, Parks and Open Space, Public Utilities	School; if not school, then Bed and Breakfast, church
S-1 and S-1A	8-16 DU/acre	17.2 acres	96-193 units	SF detached, SF attached, up to Six-unit multiplex, Day Care I, Accessory Dwelling Unit, Home Occupations, Parks and Open Space, Public Utilities	Bed and Breakfast, church
S-2	4-9 DU/acre	14.4 acres	40-89 units	SF detached, SF attached, up to Six-unit multiplex, Day Care I, Accessory Dwelling Unit, Home Occupations, Parks and Open Space, Public Utilities	Bed and Breakfast, church
S-3	4-9 DU/acre Portion is Park site	8.1 acres (also subtract 3/4 acre park)	21-46 units	SF detached, SF attached, up to Six-unit multiplex, Day Care I, Accessory Dwelling Unit, Home Occupations, Parks and Open Space, Public Utilities	Bed and Breakfast, church
S-4	4-9 DU/acre	25.7 acres	72-162 units	SF detached, SF attached, up to Six-unit multiplex, Day Care I, Accessory Dwelling Unit, Home Occupations, Parks and Open Space, Public Utilities	Bed and Breakfast, church

	units	multiplex, multifamily, live-work units, Day Care I, Accessory Dwelling Unit, Home Occupations, Parks and Open Space, Public Utilities	Housing
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Unit

No.	Density	Dev. Acres	Range[1]	Permitted Uses	Conditional Uses
S-14	4-16 DU/acre	19.6 acres	55-220 units	SF detached, SF attached, up to Six-unit multiplex, multifamily, live-work units, Day Care I, Accessory Dwelling Unit, Home Occupations, Parks and Open Space, Public Utilities	Bed and Breakfast, church
S-15	Community park site	21 acres		Park and Open Space Uses	
S-16	6-16 DU/acre	15.2 acres	85-170 units	SF detached, SF attached, up to Six-unit multiplex, multifamily, live-work units, Day Care I, Accessory Dwelling Unit, Home Occupations, Parks and Open Space, Public Utilities; retail uses per Condition 1.11.	Bed and Breakfast, church
S-17	4-9 DU/acre	16.7 acres	47-105 units	SF detached, SF attached, up to Six-unit multiplex, multifamily, live-work units, Day Care I, Accessory Dwelling Unit, Home Occupations, Parks and Open Space, Public Utilities	Bed and Breakfast, church
S-18	4-9 DU/acre	20.7 acres	58-130 units	SF detached, SF attached, up to Six-unit multiplex, Day Care I, Accessory Dwelling Unit, Home Occupations, Parks and Open Space, Public Utilities	Bed and Breakfast, church
S-19	4-9 DU/acre	14.2 acres	40-89 units	SF detached, SF attached, up to Six-unit multiplex, Day Care I, Accessory Dwelling Unit, Home Occupations, Parks and Open Space, Public Utilities	Bed and Breakfast, church
S-20	8-16 DU/acre	14.2 acres	80-159 units	SF detached, SF attached, up to Six-unit multiplex, multifamily, live-work units, Day Care I, Accessory Dwelling Unit, Home Occupations, Parks and Open Space, Public Utilities	Bed and Breakfast, church
S-21	8-16 DU/acre	13.4 acres	75-150 units	Hospital, medical office buildings, retail sales, service, hospitality, commercial uses including hotel, restaurants, gas station, convenience store, auto service stations, oil changes stores, tire stores, plant nursery/garden supply, office. Residential uses shall be prohibited.	
S-22	1-2 DU/acre	6.5 acres	5-9 units	SF detached, Day Care I, Accessory Dwelling Unit, Home Occupations, Parks and Open Space, Public Utilities	
S-23	Limited Commercial	1.2 acres		Home finding center; small office building, day care II; bank	



Parcel

Residential

Gross

Written comments submitted for City Council consideration in July, 2017

James and Anita Cox, Eagle Pointe residents

9410 Ash Ave SE / Snoqualmie, WA

The proposed DevCo project has 191 units;11 buildings from 3 to 5 stories in height with 316 parking spaces. Apartments from 1 to 5 bedrooms will be offered for individuals and families with incomes at or below 80% of median income.

The Imagine Housing project application in 2013 was for 160 units, 5 buildings with 1-3 bedrooms apartments and 14 townhomes. Target were tenants for incomes at or below 60% of median income.

Both projects meet the affordable credit's criteria. However, DevCo's proposal is massive in comparison because of the quantity of units and size of the apartments. As a consequence more parking lots and less green area if built as proposed. This may not be in compliance with various green initiatives in force in Washington.

As mentioned during one of our meetings with you there is the King County Planning Policy from 2008 that you should consider: "Low and moderate housing locations shall consider proximity to lower wage employment, access to transportation and human services, and AVOID OVER-CONCENTRATION".

Here are a few data points to consider using a Density metric defined as the quantity of Low/Moderate rental units per homes in a 0.25 mile radius.

For the actual affordable Housing units in Snoqualmie in 6 parcels: 0.4 density

For the Panorama Apt/DevCo project the density will be 0.9. This is more than twice the current figures, meaning a density of 1:1 compared to the existing single-family homes outside of S20 in a 0.25 mile radius.

The average low-income housing units size project in East King County is 45. The proposed DevCo project is four times that average.

Conclusion: The Devco proposed project may violate the King County policy regarding **Over-concentration**.

The DevCo plan includes **1- to 5-bedroom apartments** while the majority of the affordable housing projects in the area aim for 1- to 3-bedrooms.

- (i) Resolution 702, section 7C. Affordable Housing units may include studio, one, two, or three bedrooms which shall be priced for one to four-person households respectively.
- (ii) Existing affordable housing projects in Bellevue (i.e. Cascadian @ 195 units and Somerset Garden West @ 108 units) are with 1- to 2-bedrooms for 60% of the median.
- (iii) Existing projects managed by DevCo like Mill Pointe in Everett has 191 units up to 3 bedrooms. Another project like Heatherwood Apartments in Mill Creek goes from 1- to 4-bedrooms. Both projects aim at 60% of the median tenants.
- (iv) Low income Housing Tax Credits 2014 data shows that 78% of the projects across the US are under 100 units and only 3% are for 4 bedrooms or more.

Conclusion: Without a demand study there is no justification to go up to 5 bedrooms. Even 4 bedrooms should be challenged. Why go beyond the resolution 702 guidelines?

DevCo's proposed apartment sizes are above what the market is offering today; both for affordable housing and market rate units.

Comparison with Atlas Apartments in Issaquah shows that the DevCo plan will offer square footage in 1-bedroom units that is close to what Atlas offers in 2-bedroom units.

Conclusion: The size of the apartments creates a much larger footprint and massive buildings without a rationale to justify it in the affordable housing sector. It almost sounds like DevCo has a process in mind to somehow convert these units to the general market sector. Maybe they have this perception because that is just what the Snoqualmie-City Council has allowed to happen in other developments here on the ridge. Units were built with the promise of meeting affordable income goals and then allowed to migrate (after a short wait period) directly into the normal market.

Recent studies from Stanford GBS (Nov 2016) show the impact of Low Income Housing in prices of existing homes. Within a 0.1 mile radius there is about a 2.5% reduction in fair market value.

There is also a study from Arizona State University Stardust Center that concludes "there is a threshold in terms of scale-particularly for tenant-based subsidy programs- where an **over-concentration** of units in a neighborhood may result in stagnant or declining property values".

Conclusion: These studies, and common sense, indicate there will be a negative impact on property values for residents of the community. For the residents on Frontier there will be an impact starting the day the construction trucks show up.

Traffic is a key issue for the community as it is today. The proposed project will bring more cars that will go towards I-90, while Pulte is completing homes closer to the school, with the addition of retail businesses and the hotel later on. Today's reality will change for the worse.

Existing traffic mitigation plans are years away from resolving today's issues. Transportation consultants are focusing on waiting times on major intersections while we are suffering with circulation everywhere.

If this proposal goes through we will have construction trucks, cars, school buses, garbage trucks, service trucks, etc. that will affect traffic in parcels surrounding S20. We can expect more accidents. The **Frontier-Jacobia** intersection is the most obvious candidate for that to happen. The corner is underdesigned to handle the existing flow. Adding hundreds of more trips per day **will increase the risks dramatically**.

Conclusion: We need an updated study for each year of the growth plan with impacts on circulation & major intersections. A generic statement that refers to old studies has no credibility.

Minor Modification to Extend Net Developable Acreage

17.30.020(A) - DOES NOT MEET THE GOALS OF MIXED USE

The proposed apartment complex does not meet the goals of mixed use land use according to 17.30.020(A) as detailed here:

17.30.020(A)(1) Encouragement of pedestrian and non-motorized access to employment, retail goods, services and public facilities.

As no employment, retail, services or public facilities are within reasonable non-motorized distance the proposed development does not meet the requirement listed by the city's own master plan. Workforce housing should be located near employment opportunities, transport hubs, goods and services, and public facilities to meet the Master Plan requirements.

17.30.020(A)(2) Be sensitive to adjacent land uses, and avoids the creation of incompatible uses.

An apartment complex of 191 rental units is fundamentally different in use from the adjacent land and will create a stark difference in community priorities and land use between the owner occupiers the surrounding properties to the transient renters in the proposed complex. Indeed, the proposed development would be one the largest affordable housing complexes in King County which is in stark contrast to the land use of the surrounding Snoqualmie Ridge 2 development and especially Eagle Point.

17.30.020(A)(4) Protects and preserves the natural environment to the maximum extent possible including protecting view-sheds.

The proposed plan will place the equivalent of 1-2 stories above the fence line of surrounding properties, fundamentally destroying the view-shed of current residents on the northern edge of Parcel S-20.

REQUEST FOR MINOR MODIFICATION DOES NOT MEET THE INTENT OF MUFP

DevCo requests a minor modification to the MUFP to allow 191 units to be put on S-20. The original MUFP (thus intent and vision) was based on a **dispersal of affordable housing** across multiple locations. As such, the intent of affordable housing was to minimize the number of units located on any given site which is in direct opposition to the applicant's request to build more units than even originally allowed on a single parcel. Further, the application makes no case on how their request is actually aligned with the intent of the MUFP.

The city's master plan and MUFP all stated the intent was to develop affordable housing in a dispersed manner, thus **minimizing the negative impacts** and spreading economic benefits across the entire area. Following decisions by the city council violated this intent and has led to a situation where this application will be in direct opposition to the original intent of the master plan.

DOES NOT MEET "HOUSING TYPES" REQUIRED BY SMC 17.15.050

SMC 17.15.050(E)(1) states that the proposed development would require a mix of three housing types. According to the DevCo's application, the proposed development contains only one housing type "apartments". In order to satisfy this clause the developer must include a mix of two additional housing types.

SMC 17.15.050(G) prevents the city from deviating from **SMC 17.15.050(E)(1)** if such deviation poses a risk to health, safety or the environment. The material difference in utilizing the entire developable acreage for a single housing type (apartment) is the applicant's request for retaining walls up to 13 feet which would require increased excavation that poses a threat to nearby protected wetland and a safety risk to residents who could suffer serious injury or death from falling from a retaining wall double then the allowed limit. As such the city may not deviate from **SMC 17.15.050(E)(1)**, thus requiring DevCo build 3 different housing types instead of their proposed one type.

MUFP LIMITS AFFORDABLE HOUSING UNITS TO 3 BEDROOMS

Under the Affordable Housing Credit section of the **MUFP** (**Resolution 702 Section 7C**), the city limits affordable housing rental units to 3 bedrooms and a maximum of four occupants. The proposed DevCo-complex exceeds these limits by proposing apartments up to five bedrooms.

UPDATE OF 13 YEAR OLD SEPA STUDY REQUESTED

DevCo argues in their case to increase developable acreage that new information pertaining to decisions on other parcels should be included. If new information is allowed, then by the same standards new information should be included that would trigger a new SEPA study. Specifically, that neither the hospital which is a delicate site or surrounding properties were developed when the last SEPA study was performed 13 years ago.

This is particularly important because S-20 is within 1 degree of being a "Landslide hazard area" as defined by **19.12.020(Q)(1)** so with the passing of 13 years and significant surrounding construction and in-parcel utility work a SEPA review would be warranted.

SPREAD PROPOSED 191 UNITS BETWEEN S-20 AND THE PROPOSED RETIREMENT DEVELOPMENT

The single biggest change to bring the proposed development into alignment with the goals and intent of the MUFP would be to spread the proposed 191 units between S20 and the proposed retirement development which includes 40 acres of land explicitly for the city's needs, such as this:

By moving the majority of affordable housing to the retirement development, the city aligns the workforce housing with the location of current and growing job opportunities, support's it's focus of a walkable community and mitigates impacts caused by large single complexes.

I strongly urge the city to reject a single large complex and instead work on finding multiple smaller sites (20-50 apartments) which are more easily developed and are in-line with other communities in King County.

Minor Modification to Increase Retaining Wall Height

DOES NOT MEET SMC 17.30.070 DEVELOPMENT STANDARDS.

SMC 17.30.070(B) states that at least 35% of the total acreage within a proposed mixed-use plan must be dedicated to open space, natural areas, parks, recreation areas, or village greens, commons or public assembly areas, excluding streets and parking areas. The proposal from DevCo states that only 33% is dedicated in such a way with the remaining acreage utilized by; buildings at 15% and paving at 26%.

Additionally, as previously mentioned the vibration caused by the use of this land by DevCo to create and commercialize assets will violate SMC 17.30.070(B)(5).

RISK TO PROPERTY AND PERSONS DUE TO INCREASED RETAINING WALL HEIGHT

Excavation required to create retaining walls beyond the currently allowed limits would increase the risk to surrounding proprieties of **landslides**, soil erosion, create drainage problems or in the event of **earthquakes** increase the risk of property damage. An independent geographical and engineering assessment should be conducted to confirm that no increased risk is placed upon surrounding home owners and or recommend appropriate buffer zones, landscaping and other preventative measures to be adopted to mitigate found risk.

Safety should be a primary concern. Despite best efforts I'm sure kids and adults will get up along the top of the retaining walls and while a six-foot drop is bad a 13-foot drop is obviously twice as likely to cause serious injury or death.

Conditional Use Permit to Increase Building Height to 4 Stories

APPLICATION FOR CHANGE TO CONDITIONAL USE WOULD NOT PASS SMC 17.55.030

Application Conditional Use Request would not pass the Hearing Examiner's guidelines. This makes it irresponsible for the City to approve an application knowing it violates numerous existing guidelines. As stated in **SMC 17.55.030**, the hearing examiner shall be guided by the following criteria in granting a conditional use permit:

The proposed use will not be **materially detrimental** to the public welfare or injurious to the property or improvements in the vicinity and in the district in which the subject property is situated;

Vibration damage from construction has been proven in multiple studies to be injurious to the property in the vicinity of large developments such as the one proposed. Additionally, due to the very high winds which blow northerly up S-20, there is a high chance that windblown debris will damage surrounding properties and or debris will be deposited within the boundaries of surrounding land which poses a threat to children and pets. The requests for an allowance to build 4th floors would be contrary to this guideline as increase both vibration damage and the likelihood of windblown debris (angle, height and material scope).

The proposed use shall meet or exceed applicable performance standards;

The proposed development would be in violation of applicable performance standards as defined in SMC 15.55.080(C).

The proposed development shall be compatible generally with the surrounding land uses in terms of traffic and pedestrian circulation, building, and site design;

The entire proposed development is <u>not compatible</u> with the general surrounding land use in either building or site design. The proposed architecture and site design would unlikely satisfy the design review when considering **SMC 17.80.050(B)(1) & (2)** which states that harmony in textures, lines and mass is encouraged, along with buildings needing to be consistent with the established neighborhood character. Surrounding character is clearly defined by **SMC 17.15.055**.

Building mass of the proposed development is fundamentally opposed to those of surrounding properties, with the larger of surrounding houses being roughly two stories at 25 feet, however the proposed development is 41 feet, a massive 60% increase with no transitional buildings. Moreover, the square foot mass of the proposed buildings are many multiples the size of the surrounding properties. The scale of the proposed development is not at all compatible with surrounding areas.

The proposed use shall be in keeping with the goals and policies of the comprehensive plan; See previous note (17.30.020(A) – DOES NOT MEET THE GOALS OF MIXED USE

VIOLATION OF SMC 17.55.080(C) PERFORMANCE STANDARDS

SMC 17.55.080(C) provides guidelines and standards relating to natural and manmade limitations on development and applies to all land uses within the city. The specific section of the municipal code is as follows:

"C. Vibration. In all districts except planned commercial/industrial and industrial, vibration from any machine, operation or process shall not be perceptible beyond the property lines of the lot or site."

Construction of large buildings, which involve deeper foundations and larger machinery, will lead to vibrations, which will travel significant distances, certainly within the property lines of surrounding properties. Additionally, the vibrations of large excavations such as DevCo's request for large retaining walls will also create vibrations, which extend into the property lines of existing homeowners. Studies such as the following are just one of many which discusses the topic of vibration impact

http://scholarsmine.mst.edu/cgi/viewcontent.cgi?article=2969&context=icchge

DevCo's stated purpose is a for-profit developer, as such their "use" of land includes the development of company assets to generate revenue. Based on this municipal code it would be irresponsible for the City of Snoqualmie to approve an application will lead to a breach of its own code. While the parcel is zoned to allow a significant number of units, construction of such large numbers would violate the city's laws. Smaller buildings such as single detached, duplex or 2 story triplex units may provide a means for S-20 to satisfy its Affordable Housing requirement without violating the City's laws.

CONSTRUCTION MATERIALS DO NOT SATISFY 17.30.020(B)(5)

The proposed development fails to meet a requirement to advance the achievement of the foregoing purposes of the MU district and the following objectives as required by 17.30.020(B)(5) where highest quality construction materials are required. As proven by DevCo's previous properties, DevCo uses cheap, low-quality materials and building design. As the submitted plan contains similar architecture drawings and contains no commentary to the contrary the city must assume DevCo's proposal will not meet 17.30.020(B)(5)

Materials included on the external façade of Snoqualmie Ridge 2 properties include such elements as: high quality wide wood siding, brick face work, tile, large windows, window shutters, concrete driveways, etc. The proposed development should be required to maintain standards similar to the surrounding properties.

PROPOSAL DOES NOT MEET SR2 DESIGN GUIDELINES

Section B. General Construction Requirements states that properties at Snoqualmie Ridge must adhere to the following architectural styles:

- A repetitive architectural style for a group of homes should be avoided
- Differing roof forms, window design, surface materials, entryway treatments, and bay treatments should be utilized to achieve variety
- Units of identical elevation type must be separated by at least two different elevations. Identical elevations may not be across the street from one another
- Within a subdivision of a parcel, roofing materials other than natural wood products must vary in type or color
- Within a subdivision of a parcel, siding materials must vary in architectural style or color
- Builders are encouraged to produce model homes that are diverse in size, design, color and materials

The proposed development satisfies none of these requirements as proven by the submitted site map, cross sections and elevation plans.

Design guidelines go on to state that elevations, pursuant to SR II Development Standards, Sec. **11A.022(E)** and **11A.023** shall provide significant façade variation. None of the listed points are satisfied by the proposed developer.

REQUEST FOR CONSTRUCTION PLAN TO SATISFY MUFP 15.1

Given the sensitive nature of nearby wetlands and that Parcel S-20 is surrounded by existing households I believe the developer should provide details of construction plans to satisfy the residents and council that they will fulfill their obligations under **MUFP 15.1**

LOGGING PLAN TO SATISFY MUFP 18.6

2 2 3 2

The application does not detail the developer's plans to satisfy logging, conservation or replanting as required by **MUFP 18.6**. These details should be offered to the city and residents to help assess the environmental impact of this development.

REJECTION OF ANY EXCEPTION REQUEST TO EXTEND NOISE HOURS

We live in a community where it's quiet at home, safe and pleasant to walk the streets and kids are encouraged to play with each around the neighborhood. Construction times will have a real and ongoing impact on our daily lives particularly for a construction site of this size, surrounded by established existing properties.

SMC 9.36.020(B) allows the city council to deny any such requests.

SUFFICIENT BUFFER ZONES

Proposed buffer zones are almost non-existent and will not provide a visual or audible barrier between the complex and surrounding houses. Bright lights, tall buildings, noisy cars and roughly 500 people will certainly have an impact on young children around the area.

To create a balance between the needs of the existing community to maintain its identity and the new complex to create needed facilities I would suggest sufficiently sized buffer zones be created around the entire north and east sides of the apartment complex with landscaping which will mitigate viewing of buildings, carparks, lights and noise.

ACCESS INTO S-20 FROM JACOBIA/FRONTIER ONLY

All residents of Eagle Point pay a significant annual fee for upkeep of the common entrance area. The DevCo S-20 development plan does not indicate that the residents of the 191 planned units will be expected to contribute for their use of the same roads.

It would be much safer, especially during the construction stages, that another access path be created into S-20. Several options have been discussed in various meetings. Since the city gave away the rights for access past the new hospital I think it would be prudent for the city to take the initiative into expediting discussions with various parties to find a way to increase access into the S-20 area.